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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

DOCKET FILE COPY ORIGINAL

In the Matter of)

Amendment of the Commission's Rules)
To Establish New Personal Communications)
Services, Narrowband PCS)

Implementation of Section 309(j) of the)
Communications Act — Competitive Bidding,)
Narrowband PCS)

GEN Docket No. 90-314

ET Docket No. 92-100

PP Docket No. 93-253

**MOTION OF THE PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION
FOR EXTENSION OF TIME**

The Personal Communications Industry Association ("PCIA"),¹ by its attorneys,
respectfully requests that the Commission extend by two weeks the deadline for the filing of
reply comments in response to the Further Notice of Proposed Rulemaking in the above-
captioned docket.² At present, comments are due to be filed on June 18, 1997, with replies due
less than three weeks later, on July 7, 1997. Moreover, the current reply date falls on a Monday

¹ PCIA is the international trade association created to represent the interests of both the commercial and the private mobile radio service communications industries. PCIA's Federation of Councils includes: the Paging and Narrowband PCS Alliance, the Broadband PCS Alliance, the Specialized Mobile Radio Alliance, the Site Owners and Managers Association, the Association of Wireless System Integrators, the Association of Communications Technicians, and the Private System Users Alliance. In addition, as the FCC-appointed frequency coordinator for the 450-512 MHz bands in the Business Radio Service, the 800 and 900 MHz Business Pools, the 800 MHz General Category frequencies for Business Eligibles and conventional SMR systems, and the 929 MHz paging frequencies, PCIA represents and serves the interests of tens of thousands of licensees.

² *Amendment of the Commission's Rules To Establish New Personal Communications Services, Narrowband PCS*, FCC 97-140 (Apr. 23, 1997) (Report and Order and Further Notice of Proposed Rulemaking) ("*Further Notice*").

following a three-day holiday weekend. For the reasons stated below, this is an inadequate period of time for the paging and messaging industry, either individually or through its trade association, to review what are anticipated to be numerous and substantial opening round filings, evaluate the positions reflected in those filings, and prepare replies that obtain the necessary levels of review before filing with the Commission.

The current rulemaking phase of this docket is very complex and has significant business and financial implications for those providing paging and messaging services. The complexity arises from the fact that the Commission is seeking comment on a wide variety of intricate and some technical issues related to narrowband PCS, including service rules, construction and coverage requirements, auction design, treatment of designated entities, ownership disclosure requirements, and construction prior to license grant. Moreover, the scope of the potential implications of this proceeding for existing and future business plans, the effective provision of service to the public, financing arrangements and availability, and investor valuation require careful consideration and evaluation by potentially affected or otherwise interested entities.

As the trade association for the narrowband PCS industry, PCIA has been actively involved in this proceeding since its inception. Since the issuance of the *Further Notice*, PCIA has been working with its members to develop consensus positions in response to the Commission's proposals and questions. This effort has underscored PCIA's view that the issues presented in the *Further Notice* are highly complex, and that different companies may hold very divergent viewpoints about the appropriate course of action.

PCIA fully expects that a large number of comments will be filed with the Commission on June 18, 1997, and that those comments will reflect a diversity of viewpoints. On behalf of its membership, PCIA must review the opening round comments, evaluate the positions reflected in

those comments, work with its members to develop consensus reply comments, prepare those comments, and obtain the necessary review by members or their representatives before the comments may be filed with the Commission. Achievement of this task is made highly challenging by the fact that the Commission has allowed less than three weeks (including a holiday weekend just before the reply comment filing date) for interested entities to respond to each other's opening round comments. An extension of the reply comment deadline by two weeks — until July 21, 1997 — would permit all participants in the proceeding to undertake a more considered review of the record and prepare reply comments that will more effectively assist the Commission.

Given the importance of this proceeding to the future of the messaging industry, PCIA believes that the brief extension it seeks is in the public interest. A brief delay in the process at this point in time should be more than compensated for by the fact that the final order will be based on a more complete record.

PCIA therefore respectfully requests that the reply comment deadline in the above-captioned proceeding be extended until July 21, 1997.

Respectfully submitted,

PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION

By: Katherine M. Holden
Katherine M. Holden
Stephen J. Rosen
WILEY, REIN & FIELDING
1776 K Street, NW
Washington, DC 20006
(202) 429-7000

By: Robert L. Hoggarth
Robert L. Hoggarth
Senior Vice President,
Paging and Narrowband
PERSONAL COMMUNICATIONS
INDUSTRY ASSOCIATION
500 Montgomery Street, Suite 700
Alexandria, VA 22314-1561
(703) 739-0300

Its Attorneys

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